

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
Ronal Baylis, Jr.

:
Debtor. : Chapter 13
: Case No. 18-17960-AMC
:
:

**DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

Debtor-Respondent, Ronald Baylis, Jr., (hereafter “Debtor”) responds to the Motion of Pennsylvania Housing Finance Agency (hereinafter the “PHFA”) for Relief from the Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The Debtor believes he made two payments via MoneyGram and is looking for the receipts. One payment should be for \$862.00 and the other payment should be for \$900.00.
7. Denied.
8. Denied as the Debtor does not believe his payments are being accounted for by PHFA.
9. Admitted.

10. Denied. Proof of the aforementioned payments will be supplied by the hearing date. In addition, the Debtor's attorney will be holding \$862.00 in certified funds by the hearing date and the Debtor proposes to cure the remaining arrears over six months beginning with the May 2019 payment.

11. Admitted.

WHEREFORE, Debtor respectfully requests an Order denying PHFA's Motion.

Dated: April 2, 2019

BY: /s/ Christopher G. Cassie, Esq.
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